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Letter to Mr. William F. Caton  
Federal Communications Commission  
August 27, 1997

To do so, these carriers will necessarily rely on WorldCom's billing detail which accompanies WorldCom's invoice to the carrier. Our carrier customers can be expected to object if WorldCom treats calls reflecting ANI 07 as chargeable.

As noted above, the White Paper claims that members of the LEC ANI Coalition do not view ANI 07 as an impediment to their own tracking obligations. This is not surprising. First, LECs will have a tracking obligation only for calls originating within their own exchange territories. Second, the LECs are in a position to continually update their ANI databases for their own use, since every LEC administers all line additions in its own exchange territory. Moreover, while IXCs must review data from every LEC database, LECs will only need to compare their call records with their own database. While nothing prohibits a LEC payor from using the ANI lists to remedy its own failure to provide coding digits, nothing requires any other payor to do so.

The members of the LEC Coalition might prefer for WorldCom and other IXCs to subscribe to expensive LIDB validation or Flex ANI service to facilitate call tracking. No such result is required by the Payphone Orders. The Reconsideration Order (§ 64) could not be clearer on this point:

LECs must make available to PSPs, on a tariffed basis, such coding digits as a part of the ANI for each payphone. (emphasis supplied)

This sentence was a clarification adopted specifically in response to requests for reconsideration filed by MCI and AT&T. MCI had asked the Commission to confirm that the ANI 07 indicator, by itself, is insufficient to identify a payphone. In its petition, MCI noted that "a link between call tracking and the compensation obligation is necessary for carriers to be able to pass compensation charges on to the cost causer, which the Commission states carriers can do." MCI Petition at 9.

The Reconsideration Order requires that LECs make available tariffed services to the PSPs which will enable PSPs to transmit specific payphone coding digits as part of their ANI. No LEC or PSP sought review of this straightforward directive, and payors like WorldCom have structured their call tracking plans to take into account this substantial clarification obtained by MCI and AT&T.

Clearly, the obligation of payors like WorldCom is limited to recognizing valid payphone identifiers. The fanciful

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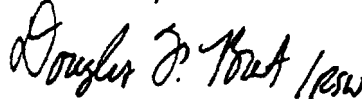
notion that payors are required to purchase enhanced OLS to comply with compensation requirements is nonsense. However, even if such a claim were otherwise arguable, the Commission's recent waivers to various LECs of deadlines to provide OLS makes clear that the requirement of LEC compliance with the Reconsideration Order is completely independent of the compliance schedule for implementation of enhanced OLS.

In granting a waiver to nine different LECs, the Common Carrier Bureau on July 31 reminded all LECs that "the extensions granted today do not alter or otherwise modify any obligations of these or other LECs under the Commission's Payphone Order and the Payphone Reconsideration Order."<sup>3</sup> Thus, LECs are to comply with ¶64 of the Reconsideration Order regardless of whether the LEC has implemented OLS by October 7, the beginning of the tracking period.

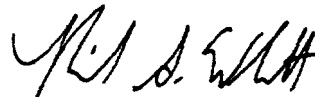
In short, although IXCs like WorldCom have been burdened with numerous administrative obligations to implement per call compensation, the obligation to subscribe to additional screening services is not one of them. WorldCom will regard info digit pairs, 27, 29 and 70 as valid payphone identifiers. Digit pair 07 is not a payphone identifier, and WorldCom will not treat as compensable any calls which include this digit pair.

Sincerely yours,

WORLD COM, INC.



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**CERTIFICATE OF SERVICE**

I, Cecelia Y. Johnson, hereby certify that I have this 6th day of November, 1997, sent a copy of the foregoing "Reply Comments of WorldCom, Inc." by hand delivery to the following:

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